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June 28, 2023

Via ECF

Hon. Denise L. Cote
United States District Court for the Southern District of New York
500 Pearl Street, Room 1910
New York, NY 10007

Granted.
Denise L. Cote
6/29/23

Re: *American GreenFuels Rockwood (Tennessee), LLC v. Aik Chuan Construction PTE, Ltd.*
(Case No. 1:21-cv-07680-VSB)

Dear Judge Cote:

We write on behalf of American GreenFuels Rockwood (Tennessee), LLC ("AGFR") and Kolmar Americas, Inc. (together, "Kolmar") pursuant to Section 8 of Your Honor's Individual Rules and Practices to request permission to file under seal Exhibits A, B, and C to Kolmar's Opposition to Aik Chuan's June 26, 2023 letter (ECF 78-1) requesting an information conference. Attached hereto as Exhibit 1 is a redacted copy of Kolmar's Opposition to Aik Chuan's June 26, 2023 letter where Exhibits A, B, and C have been omitted and specific references to the exhibits have been redacted. Contemporaneously with the filing of this letter, Kolmar will also file under seal an unredacted copy of Kolmar's Opposition Response with Exhibits A, B, and C.

Kolmar respectfully submits this letter because Exhibit A is a deposition transcript, Exhibit B is a rough deposition transcript, and Exhibit C is an exhibit from a deposition. Pursuant to the confidentiality order entered by the Court, the transcript and exhibits must be treated presumptively as Highly Confidential during the time for transcription and continuing until fourteen (14) days after delivery of the final transcript. (ECF 66 ¶ 19.) Since this time period has not yet expired, there is good cause to file each of these exhibits under seal at this time.

With respect to Aik Chuan's request to seal Exhibit A to its June 26, 2023 letter (ECF No. 78, 78-1), Kolmar agrees the Court should find good cause to seal Exhibit A from the public record for reasons set forth by Kolmar in its letter attached hereto as Exhibit 1.

We thank the Court for its consideration of this letter.

Respectfully submitted,

By /s/ John N. Thomas
John N. Thomas

cc: Counsel of Record via ECF

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